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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF NEVADA

8 * * *

9 UNITED STATES OF AMERICA,
10 Plaintiff,

10-CR-00325-PMP-RJJ

11 vs.

**UNOPPOSED MOTION TO
CONTINUE RESPONSE DUE DATE**

12 COREY THOMPSON,

13
14 Defendant.

15 The United States respectfully requests that the Court grant it leave to file responses to
16 defendant's sealed motions to suppress filed on May 16, 2012, Docs. ___ and ___. Rene Valladares,
17 counsel for defendant, has no objection to this continuance. In support, the government shows the
18 Court as follows:

19 On May 31, 2012, counsel for the government noticed a reference to defendant's filings in
20 defendant's most recent demand for additional discovery. The government attempted to locate the
21 motions but could not find them and asked defense counsel for copies, which defense counsel
22 provided on May 31, 2012. The government also learned on that date that defendant had filed his
23 sealed motions on May 16, 2012, which would have made the government's responses due on May
24 30, 2012. After searching for the motions on May 31, 2012, and on this date, counsel for the
25 government located the motions, which had been filed unbeknownst to counsel.

26 On May 31, 2012, counsel for the government contacted defense counsel, who agreed to a
27 short continuance for filing the government's response. However, defense counsel would not agree
28 to a consolidated date in the future, responsive to the current pending motions and an additional

1 motion that defendant has not filed.

2 Given defendant's objection, the government requests two weeks to file its responses to the
3 two pending sealed motions, as the government has a response due on this date in United States v.
4 Booth, et al., 2:08-cr-283-RCJ, an additional response due in that case on June 7, 2012, as well as
5 hearings on pending motions in that case on June 8, 2012. Counsel for the government recently
6 finished trial in United States v. Mageno, 11-cr-048-JCM.

7 Trial in this case is set on July 23, 2012. A continuance of two weeks for the government's
8 responses to the pending sealed motions, or until June 15, 2012, will not affect the trial date,
9 especially in light of the fact that government anticipates additional motions filed by defendant.
10 Furthermore, on that date, June 15, 2012, the government will be producing witness statements and
11 impeachment evidence to defendant, in compliance with the Court's Order of May 18, 2012.
12 (Doc.96). The government's error in failing to realize the receipt of defendant's motions was not
13 based on foul intent or on an effort to gain unfair advantage. Rather, the government's error arose
14 out of a hectic schedule and unintentional miscommunication.

15 Therefore, for the forgoing reasons, the United States requests that the Court grant it leave
16 to file its responses to defendant's sealed motions on or by June 15, 2012. Further, defendant will
17 have until June 22, 2012 to reply.

18
19 Dated this 1st day of June 2012.

20 DANIEL G. BOGDEN
21 United States Attorney

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23 _____/s/
24 KATHLEEN BLISS
25 NICHOLAS DICKINSON
26 Assistant United States Attorneys
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

10-CR-00325-PMP-RJJ

Plaintiff,

vs.

ORDER

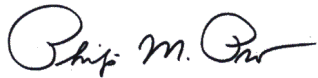
COREY THOMPSON,

Defendant.

The Court, having reviewed the unopposed motion of the government, requesting additional time within which to respond to defendant's sealed Motions filed on May 16, finds good cause to grant the government's motion.

IT IS THEREFORE ORDERED that the government shall have up to and including June 15, 2012, to respond to the sealed Motions filed on May 16, 2012.

IT IS FURTHER ORDERED that the defendant shall have up to and including June 22, 2012 to reply.



UNITED STATES DISTRICT JUDGE

DATE: June 4, 2012. _____